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COUNSEL FOR THE DEBTOR

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
	§	
WEST HOUSTON MEMORY CARE, LLC	§	Case No. 19-31485-sgj-11
	§	
Debtor.	§	
	§	
	§	

**MOTION TO CONTINUE HEARING ON THE APPLICATION FOR ALLOWANCE
AND PAYMENT OF ADMINISTRATIVE EXPENSES PURSUANT TO 11 U.S.C.
§503(B)(1) FILED BY J&M FAMILY MANAGEMENT LLC**

TO THE HONORABLE STACEY G. C. JERNIGAN,
UNITED STATES BANKRUPTCY JUDGE:

West Houston Memory Care, LLC, debtor and debtor-in-possession in the above-referenced case (the “Debtor”) hereby files this *Motion to Continue Hearing on the Application for Allowance and Payment of Administrative Expenses Pursuant to 11 U.S.C. §503(B)(1) filed by J&M Family Management LLC* (the “Motion”) In support of the Motion, the Debtor respectfully shows the Court as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b). This matter is a core proceeding and this Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

II. BACKGROUND

2. On May 2, 2019 (the “Petition Date”), the Debtor and several of its affiliates¹ commenced Chapter 11 cases by filing voluntary petitions for relief under Chapter 11 of Title 11 of the United State Code §§ 101, *et seq.* (the “Bankruptcy Code”).

3. No trustee or examiner has been appointed in the Debtor’s Chapter 11 Case.

4. On February 16, 2021, J&M Family Management LLC (“J&M”) filed its *Application for Allowance and Payment of Administrative Expenses Pursuant to 11 U.S.C. 503(B)(1)* (the “Application”) [Docket No. 77]. Debtor filed its Objection to the Application on March 18, 2021 [Docket No. 79] and J&M filed a Reply to Debtor’s Objection on April 1, 2021 [Docket No. 88].

5. On May 14, 2021 a Notice of Hearing [Docket No. 96] was filed and the Application was set for hearing on July 12, 2021 at 2:30 p.m.

6. Debtor and J&M’s counsel continue to engage in settlement discussions and hope to resolve the Objection without the need for a hearing. Accordingly, the Debtor files this Motion seeking to continue the hearing on the Application for at least 14 days to allow Debtor and J&M additional time to attempt to resolve the Objection and the hearing.

¹ Pearland Memory Care, LLC and Cinco Ranch Memory Care, LLC’s First Amended Joint Plan of Liquidation was confirmed by the Court on February 28, 2020 [Docket No. 585]. Riverstone Memory Care, LLC’s bankruptcy case was dismissed on March 27, 2020 [Docket No. 613]. The LaSalle Group, Inc. filed a Motion to Convert its bankruptcy case to Chapter 7 on June 30, 2020 [Docket No. 694]. An order was entered converting The LaSalle Group, Inc.’s case to one under Chapter 7 on September 16, 2020 [Docket No. 780].

III. REQUEST FOR RELIEF

7. By this Motion, the Debtor respectfully requests the Court continue the hearing for at least 14 days to allow Debtor and J&M to continue to engage in settlement discussions and attempt to resolve the Objection without the necessity of a hearing.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that the Court enter an order granting a continuance of the hearing for 14 days, and such other and further relief as the Court deems appropriate.

Dated: June 30, 2021.

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was filed with the Court and served electronically upon all parties registered to receive notice via the Court's CM/ECF system on this 30th day of June, 2021.

By: /s/ Christina W. Stephenson

Christina W. Stephenson

CERTIFICATE OF CONFERENCE

I hereby certify that on June 29th, 2021, I conferred with Melissa Hayward, Counsel for J&M Family Management, LLC and she stated that she is not opposed to the relief requested in this Motion.

By: /s/ Christina W. Stephenson

Christina W. Stephenson